

COOLEY LLP  
WHITTY SOMVICHIAN (194463)  
(wsomvichian@cooley.com)  
MAX A. BERNSTEIN (305722)  
(mbernstein@cooley.com)  
CAROLINE A. LEBEL (340067)  
(clebel@cooley.com)  
3 Embarcadero Center, 20<sup>th</sup> floor  
San Francisco, CA 94111-4004  
Telephone: +1 415 693 2000  
Facsimile: +1 415 693 2222

ELIZABETH M. PIPKIN (243611)  
ANN M. RAVEL (62139)  
McMANIS FAULKNER  
50 West San Fernando Street, 10th Floor  
San Jose, CA 95113  
Telephone: (408) 279-8700  
Facsimile: (408) 279-3244  
epipkin@mcmanslaw.com  
aravel@mcmanslaw.com

*Attorneys for Plaintiffs*

*Attorneys for Defendant*  
**GOOGLE LLC**

*Additional Counsel on next page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-07956-VKD

**L.R. 6-2 STIPULATED REQUEST TO  
EXTEND CASE DEADLINES AND  
[PROPOSED] ORDER**

Judge: Hon. Virginia K. DeMarchi

1 GLEN E. SUMMERS (176402)  
2 KARMA M. GIULIANELLI (184175)  
3 LINDLEY J. BRENZA (*pro hac vice*)  
4 JONATHAN JACOB MARSH (*pro hac vice*)  
5 BARTLIT BECK LLP  
6 1801 Wewatta Street, Suite 1200  
7 Denver, CO 80202  
8 Telephone: (303) 592-3100

MARC A. WALLENSTEIN (*pro hac vice*)  
GEORGE A. ZELCS (*pro hac vice*)  
RYAN Z. CORTAZAR (*pro hac vice*)  
CHAD E. BELL (*pro hac vice*)  
PAMELA I. YAACOUB (*pro hac vice*)  
KOREIN TILLERY LLC  
205 North Michigan Avenue, Suite 1950  
Chicago, IL 60601  
Telephone: (312) 641-9750  
Facsimile: (312) 641-9751

CAROL L. O'KEEFE (*pro hac vice*)  
MICHAEL E. KLENOV (277028)  
KOREIN TILLERY LLC  
505 North Seventh Street, Suite 3600  
St. Louis, MO 63101  
Telephone: (314) 241-4844  
Facsimile: (314) 241-3525

11  
12 *Attorneys for Plaintiffs*  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Pursuant to this Court’s Case Management Order (ECF No. 99) and Civil L.R. 6-2, Plaintiffs Joseph Taylor, Edward Mlakar, Mick Cleary, Eugene Alvis, and Jennifer Nelson (“Plaintiffs”) and Defendant Google LLC (“Google”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

**WHEREAS**, counsel for the Parties are also litigating the *Csupo, et al. v. Google LLC* matter in the Superior Court of Santa Clara County (Complex Division) before Judge Charles F. Adams, which raises materially the same claims at issue here;

**WHEREAS**, on April 9, 2025, the Parties previously stipulated to the following deadlines, which were approved in the Court’s April 10, 2025 scheduling order (ECF 189): (1) July 8, 2022 for the Parties’ reply briefs for their respective expert challenge motions and for Plaintiffs’ reply brief for their class certification motion, and (2) July 22, 2025 for the hearing on the foregoing motions;

**WHEREAS**, when the above dates were set, the jury trial in *Csupo* was scheduled to begin June 2, 2025 and expected to end no later than June 20, 2025, which would have allowed counsel for the Parties sufficient time to prepare and file the above briefing by the July 8, 2025 deadline;

**WHEREAS**, due to the Superior Court’s availability in the week of June 9, 2025 and other scheduling issues that were unanticipated at the time of the Parties’ April 9, 2025 stipulation, closing arguments in the *Csupo* trial did not occur until June 30, 2025;

**WHEREAS**, the Parties jointly request an extension, as set forth below, of the briefing deadlines and the hearing date for their pending motions, and agree that good cause exists to grant the requested extensions for the following reasons;

**WHEREAS**, given the unexpected length of jury trial proceedings in the parallel *Csupo* action, in which all counsel for the Parties here are involved, the requested extensions are necessary so that the Parties can prepare and present the most helpful briefing to this Court on their pending motions;

**WHEREAS**, the requested extensions will not impact other deadlines or the trial date in this case

**NOW, THEREFORE**, the Parties, by and through their respective counsel, stipulate and

agree that the following revisions should be made to the case schedule:

Event	Current Deadline	Stipulated Date
Class Certification and Expert Challenges Replies	July 8, 2025	July 22, 2025
Class Certification and Expert Challenges Hearing	July 22, 2025	Either August 11 or 12, 2025 (subject to the Court's availability)

**IT IS SO STIPULATED.**

Dated: July 1, 2025

Respectfully submitted,

COOLEY LLP

By: /s/ Whitty Somvichian

Whitty Somvichian

Attorney for Defendant  
GOOGLE LLC

Dated: July 1, 2025

KOREIN TILLERY LLC

By: /s/ Marc A. Wallenstein

Marc A. Wallenstein

Attorney for Plaintiffs

**ATTESTATION OF CONCURRENCE IN FILING**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, the undersigned hereby attests that concurrence in the filing of this document has been obtained.

1 Dated: July 1, 2025

COOLEY LLP

2  
3 /s/ Whitty Somvichian

4 Whitty Somvichian

5 Attorneys for Defendant  
6 GOOGLE LLC  
7  
8  
9  
10  
11  
12

13 **PROPOSED ORDER**

14  
15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

16  
17 DATED: \_\_\_\_\_

18 \_\_\_\_\_  
19 The Honorable Virginia K. DeMarchi  
20 United States District Judge  
21  
22  
23  
24  
25  
26  
27  
28